

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

WALTER S. JOHNSON BUILDING COMPANY, INC.,

PLAINTIFF,

NOTICE OF MOTION

-vs-

CIVIL No. 09-cv-1083

BAGGAGE OR CONTAINER AUTOMATION, INC.,
LAWRENCE MAJEWSKI, AND
SHANNON MAJEWSKI,

MAGISTRATE JUDGE
H. KENNETH SCHROEDER, JR.

DEFENDANTS.

MOTION BY:

Counsel for defendants, Goldberg Segalla LLP.

RELIEF REQUESTED:

An order that: (1) permits Goldberg Segalla LLP to withdraw as defendants's counsel; (2) grants the parties an extension of time to provide Rule 26(a)(1) Initial Disclosures; and (3) grants such other and further relief as the Court deems just and proper.

SUPPORTING PAPERS:

This Notice of Motion and the accompanying Affirmation of Richard A. Braden, Esq., dated March 24, 2010 (to be filed under seal).

RELIEF DEMANDED:

Order pursuant to Local Rules 83.2(c) of the United States District Court for the Western District of New York permitting Goldberg Segalla LLP to withdraw as counsel for Defendants, and extending the time for the parties to exchange initial disclosure pursuant to Fed.R.Civ.P. 26(a)(1).

BASIS FOR RELIEF REQUESTED: Local Rule 83.2(c).

PLACE: United States Courthouse
68 Court Street
Buffalo, New York 14202

DATED: Buffalo, New York
March 24, 2010

GOLDBERG SEGALLA LLP

s/ *Richard A. Braden*

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